ANNUAL REPORT
OF THE
ALBERTA HEALTH OCCUPATIONS BOARD

For the period of
January 1, 1983 to December 31, 1983

Alberta Health Occupations Board
8th Floor, West Tower
Devonian Building
11160 Jasper Avenue
Edmonton, Alberta
T5K 0L2

January 1984

Alberta
HEALTH OCCUPATIONS BOARD

Chairman Mr. Elvin Christenson, FCA

8th Floor West Tower, Devonian Building, 11160 Jasper Avenue, Edmonton, Alberta, Canada T5K 0L2

In Replying Please Quote:

January 24, 1984

To The Honourable David King
Minister Responsible for
Professions and Occupations

Sir:

I am pleased to present the Annual Report of the Health Occupations Board for the year January 1, 1983 to December 31, 1983.

Respectfully submitted,

Elvin Christenson, FCA
Chairman
Alberta Health Occupations Board

Back Row standing (left to right)

Mr. D.C.L. Jones
Mr. Ted Bruce
Mr. Dennis Gartner
Mrs. Lucille M. Lisowski
Mr. Murray W. Ross
Ms. Dona Carlson
Dr. C.J. Fairbanks

Front Row seated (left to right)

Dr. William A.J. Donald
Mrs. Marlys Carruthers
Mr. Elvin Christenson
Mr. John Low

TABLE OF CONTENTS

		Page
I.	**INTRODUCTION**	1
II.	**THE HEALTH OCCUPATIONS ACT**	1
	A. History of the Act	1
	B. Objectives of the Act	1
III.	**ALBERTA HEALTH OCCUPATIONS BOARD**	2
	A. History of the Board	2
	B. Membership of the Board	2
	C. Functions of the Board	2
IV.	**PROCEDURES FOR REGULATING HEALTH OCCUPATIONS**	3
	A. Conducting Investigations of Health Occupations	3
	B. Designating Health Occupations	4
	C. Establishing Health Occupation Committees	4
	D. Regulating Designated Health Occupations	4
	E. Registering Practitioners for Health Occupations	5
V.	**INVESTIGATIONS CONDUCTED BY THE HEALTH OCCUPATIONS BOARD**	6
	A. Respiratory Technology	7
	B. Electrology	7
	C. Herbalist	8
	D. Nursing Assistant	8
	E. Rehabilitation Practitioner	9
	F. Orthopaedic Technology	10
	G. Acupuncture	10
	H. Domiciliary Midwifery	11
	I. Hearing Aid Audiology	12
VI.	**REQUESTS FOR NEW INVESTIGATIONS**	12
VII.	**HEALTH OCCUPATIONS ACT AMENDMENTS**	12
VIII.	**FOR ADDITIONAL INFORMATION**	13

I. INTRODUCTION

The present report is the second **Annual Report** of the Alberta Health Occupations Board, which was established under the **Health Occupations Act**. The report describes the **Health Occupations Act**, the Health Occupations Board, procedures for establishing regulated health occupations, and the Board's activities from January 1, 1983 to December 31, 1983.

II. THE HEALTH OCCUPATIONS ACT

A. History of the Act

The Government of Alberta first introduced the **Health Occupations Act** (Bill 30) on June 28, 1979; but on November 14, 1979, the government announced that it would not proceed with Bill 30 in the 1979 Session of the Legislature.

The **Health Occupations Act** (Bill 84) was re-introduced on October 30, 1980, and incorporated many of the suggestions, which various concerned groups had presented regarding Bill 30. The Health Occupations Act was passed by the Legislature on November 27, 1980 and was proclaimed by the Lieutenant Governor in Council on December 16, 1981.

B. Objectives of the Act

The major objectives of the **Health Occupations Act** are as follows:

1. to provide a means for regulating a wide variety of health occupations which are not presently regulated by any provincial legislation in Alberta;

2. to protect the public with legislative safeguards where there is risk of harm from the practice of an unregulated health occupation;

3. to provide protection for practitioners of designated health occupations, who prior to designation may have been contravening the provisions of the **Medical Profession Act** or other health professional acts;

4. to implement the Government of Alberta's "Policy Governing Future Legislation for Professions and Occupations" (1977), which stated that each regulated occupation or profession should be self-regulating where practical rather than placed under the legislative supervision of another occupation or profession;

5. to establish the Health Occupations Board to advise the provincial government on matters respecting the future regulation of various health occupations which are not presently regulated in the province;

6. to provide a degree of "peer" regulation for those health occupations regulated under the **Health Occupations Act**;

7. to put in place legislation that permits the Government of Alberta to quickly respond to the need and desire for regulation by various health occupations; and

8. to eliminate the costs to professional associations of registering and disciplining practitioners of those health occupations regulated under the Act.

III. ALBERTA HEALTH OCCUPATIONS BOARD

A. History of the Board

After the **Health Occupations Act** was proclaimed on December 16, 1981, the Lieutenant Governor in Council established the Alberta Health Occupations Board and appointed the members of the Board. The Alberta Health Occupations Board held its first meeting on January 12, 1982.

Between December 16, 1981 and December 8, 1982, the Board reported to the Honourable Dr. P.N. Webber, who is now Minister of Social Services and Community Health and was at that time the Minister responsible for Professions and Occupations. On December 9, 1982, the Board began reporting to the Honourable Mr. David King, Minister of Education and now also Minister responsible for Professions and Occupations.

B. Membership of the Board

According to the **Health Occupations Act**, the Alberta Health Occupations Board shall consist of not more than nine members. At least one but not more than three members of the Board shall be members of the College of Physicians and Surgeons of Alberta.

A representative of the Department of Advanced Education is entitled to attend the meetings of the Board as an observer. The Secretariat of the Alberta Health Occupations Board consists of the Registrar of Health Occupations who is also Secretary to the Board, and any other staff provided by the Minister to carry out the work of the Board.

The current members of the Alberta Health Occupations Board and of the Board's Secretariat are given in Table 1.

TABLE 1
MEMBERS OF THE ALBERTA HEALTH OCCUPATIONS BOARD AND OF THE BOARD'S SECRETARIAT, FOR 1983

Board Members

Chairman	Mr. Elvin Christenson, FCA, Edmonton
Deputy Chairman	Mrs. Marlys Carruthers, Calgary
Members:	Dr. William A.J. Donald, Calgary
	Dr. C.J. Fairbanks, Calgary
	Mr. D.C.L. Jones, Calgary
	Mrs. Lucille M. Lisowski, Edmonton
	Mr. John W. Low, Ponoka
	Mr. Murray W. Ross, Edmonton

Secretariat

Registrar	Mr. Dennis Gartner
Consultant	Mr. Ted Seacrest (January 1, 1983 to March 30, 1983)
Research Officer	Ms. Dona Carlson (from May 24, 1983)

Observer

Advanced Education	Mr. Ted Bruce

C. Functions of the Board

The following are the major functions of the Alberta Health Occupations Board:

1. to conduct investigations to determine if specific health occupations should be regulated under the Act;

2. to recommend to the Minister that amendments to the **Health Occupations Act** be passed by the Legislature to designate specific health occupations.

3. to make regulations regarding the educational qualifications, scopes of practice, and standards of conduct for health occupations regulated under the **Health Occupations Act**; and

4. to act as an appeal body for decisions of the Health Occupation Committees which are established for the health occupations regulated under the Act.

IV. PROCEDURES FOR REGULATING HEALTH OCCUPATIONS

A. Conducting Investigations of Health Occupations

Under the **Health Occupations Act**, the Alberta Health Occupations Board must conduct an investigation (or an assessment) to determine if a specific health occupation should be regulated under the Act under either of the following circumstances:

1. when an application or request to the Board has been made by a professional association, which represents practitioners of a health occupation, for that occupation to be regulated under the Act; or

2. when the Minister has requested the Board to conduct an investigation of a health occupation.

Under the Act, the Board must examine the following nine points in conducting its investigation of a health occupation:

1. the complexity of the tasks performed by practitioners of the health occupation;

2. the degree of supervision which personnel receive;

3. the educational programs for that health occupation in Alberta;

4. the educational programs which exist for that occupation outside of the province;

5. the risk to the public from persons practising the health occupation;

6. the services practitioners may provide to individuals requiring care and treatment;

7. the ability of personnel to practise on an independent basis;

8. the desirable qualifications for practitioners; and

9. the minimum standards of competency for personnel.

During its initial year, the Board established procedures for conducting investigations to determine whether or not particular health occupations should be designated health occupations under the Act. More specifically, the Board decided that its investigations of health occupations may involve the following three stages:

1. a first stage investigation (the preparation of a report of a preliminary investigation of the health occupation);

2. a second stage investigation (the submission of written briefs and the hearing of oral presentations from groups which are concerned about the health occupation); and

3. a third stage investigation (the preparation of a report of the final results of the Board's investigation of the health occupation).

B. Designating Health Occupations

Under the **Health Occupations Act**, when the Board completes its investigation of a health occupation and has assessed all required matters, it must decide if the degree of risk of harm to the public from the practice of that occupation is such that the occupation should be regulated under the Act. If the Board decides that such risk of harm exists, then it may recommend to the Minister that legislation be enacted to designate the health occupation.

The Government of Alberta may then introduce into the Legislative Assembly of Alberta an amendment to the **Health Occupations Act** designating that occupation.

C. Establishing Health Occupation Committees

After the Legislature has passed an amendment to the Act designating a health occupation, the Minister will by order establish a Health Occupation Committee for that designated occupation. He will appoint the members of the Committee which will then report to the Alberta Health Occupations Board.

According to the **Health Occupations Act**, a Health Occupation Committee must consist of a minimum of three and a maximum of nine members. When a Committee is first established, each of its members must either be a practitioner of the designated health occupation or be knowledgeable about the practice of the occupation. Once the registration of practitioners of a designated health occupation has begun, then according to the Act any new appointees to that Committee will have to be registered practitioners of that occupation. The major functions of the Health Occupations Committees are as follows:

1. to act as an advisory body to the Alberta Health Occupations Board with respect to the services that registered practitioners of a designated health occupation may provide, the standards of conduct for registered practitioners, and the qualifications and training for practitioners;

2. to advise and direct the Registrar of Health Occupations with respect to applications for registration to practise a designated occupation and to annual re-registrations of registered practitioners of that occupation; and

3. to exercise the same authority as all other professional regulatory bodies with respect to disciplinary matters involving registered members of that health occupation.

D. Regulating Designated Health Occupations

Under the **Health Occupations Act**, the Alberta Health Occupations Board makes the actual regulations for each designated health occupation. However, the Board is required to consult with the Health Occupation Committee established for the designated health occupation, before it makes any regulations for that occupation.

Under the Act, the Board may make the following kinds of regulations for a designated health occupation:

1. regulations prescribing the services that a designated health occupation may provide;

2. regulations prescribing conditions under which or limitations within which a designated occupation may provide services;

3. regulations establishing the qualifications and conditions of eligibility of persons who may apply for registration to practise in a designated health occupation;

4. regulations prescribing the forms which the Registrar of Health Occupations will use for the purpose of administering the **Health Occupations Act**;

5. regulations respecting registers which the Registrar shall establish and maintain for each designated occupation;

6. regulations prescribing standards of conduct and competency for registered practitioners of a designated health occupation;

7. regulations prescribing the date or dates for the annual re-registration of registered members of that occupation;

8. regulations respecting training programs which applicants for registration must have completed in order to practise a designated health occupation in Alberta; and

9. regulations respecting examinations to determine the eligibility of applicants who have successfully completed the required training programs.

Under the **Health Occupations Act**, regulations made by the Board must be approved by the Lieutenant Governor in Council. Also, the Lieutenant Governor in Council may, with respect to any regulations made by the Board, do any one of the following:

1. approve the regulations;

2. vary the regulations and approve the regulations as varied; or

3. disapprove the regulations.

Under the Act, if the Minister has requested the Board to make any new regulations or to amend or repeal any existing regulations and the Board neglects or refuses to make, amend, or repeal the requested regulations within 60 days; then the Lieutenant Governor in Council may make, amend, or repeal the requested regulations.

E. Registering Practitioners of Health Occupations

The **Health Occupations Act** provides for the appointment of a Registrar of Health Occupations. The major functions of the Registrar of Health Occupations are as follows:

1. to provide information to enable the Board to conduct investigations to determine if specific health occupations should be regulated under the **Health Occupations Act**.

2. to serve as Secretary of the Alberta Health Occupations Board and as Secretary of the various Health Occupations Committees, or alternatively, to delegate this latter function to any employee of the provincial government or any member of a Committee;

3. to register all applicants who meet the qualifications prescribed by the Board and to refer those who do not meet these qualifications to the appropriate Health Occupation Committee for review; and

4. to receive and refer any complaints respecting registered practitioners under the Act to the appropriate Health Occupation Committee for review and possible disciplinary action.

The following procedures will be adopted regarding the registration of practitioners of designated health occupations under the **Health Occupations Act**:

1. The Registrar of Health Occupations will set up the registration procedures and forms as prescribed in the regulations for the various designated health occupations.

2. He will register all applicants who meet the qualifications for registration prescribed by the Board.

3. If the Registrar is not satisfied that an individual applying for registration is eligible to be registered, he will refer the application to the appropriate Health Occupation Committee for review.

4. He will establish and maintain a register of all registered practitioners of each designated health occupation.

5. Annual re-registration forms will be submitted to the Registrar of Health Occupations from all the registered practitioners of the various designated health occupations.

6. The Registrar will refer to the appropriate Health Occupation Committee any annual re-registration form, in which a registered practitioner has indicated that he or she has practiced for less than 30 days out of the year or that he or she did not participate in an educational program related to the practice of the health occupation during the year.

7. There will be no fees for the initial registrations or for the annual re-registrations of registered practitioners of the designated health occupations under the Act.

V. INVESTIGATIONS CONDUCTED BY THE HEALTH OCCUPATIONS BOARD

During the period from January 1 to December 31, 1983 the Board completed its investigations of **nine** health occupations:

1. Respiratory Technology
2. Electrology
3. Herbalism
4. Nursing Assistant
5. Rehabilitation Practitioner
6. Orthopaedic Technology
7. Acupuncture
8. Domiciliary Midwifery, and
9. Hearing Aid Audiology

As charged by the **Health Occupations Act** the Board conducted an investigation for each occupation which focussed upon the following issues:

1. complexity of tasks performed
2. degree of supervision
3. training programs in Alberta
4. training programs outside Alberta
5. risk to the public
6. services personnel may provide
7. ability of personnel to practice independently
8. minimum qualifications for practitioners
9. minimum standards of competency for practitioners

While all nine issues were considered, the issue of 'risk to the public' was given particular attention.

As part of its investigation procedure the Board requested that groups concerned with practice of each health occupation submit written briefs to the Board. In these briefs, the groups were asked to direct themselves primarily to the aforementioned nine issues. The concerned groups contacted for each occupation included professional associations for health personnel, physician organizations, provincial government agencies, and educational institutions. The Board also asked members of the public to submit briefs or letters respecting the designation of herbalism, acupuncture, domiciliary midwifery, and hearing aid audiology under the **Health Occupations Act**.

The next section will review the results of the investigation for each of the nine occupations the Board investigated this year.

A. Respiratory Technology

The Board's investigation of this occupation was initiated by a request from the Alberta Society of Respiratory Technologists in May of 1982.

The Board invited briefs from 17 organizations and received briefs from the following 13 organizations:

1. Northern Alberta Institute of Technology
2. Southern Alberta Institute of Technology
3. Alberta Hospital Association
4. Alberta Medical Association
5. Canadian Medical Association
6. College of Physicians and Surgeons of Alberta
7. Alberta Association of Registered Nurses
8. Alberta Society of Respiratory Technologists
9. Manitoba Association of Registered Respiratory Technologists
10. Alberta Hospitals and Medical Care
11. Alberta Social Services and Community Health
12. Alberta Advanced Education and Manpower
13. Manitoba Department of Health

Only one organization opposed the designation of this occupation, expressing the view that the existent regulatory system was more than satisfactory and that regulating these personnel under the **Health Occupations Act** might needlessly duplicate or undermine existing regulatory systems, and furthermore, might restrict the interprovincial mobility of these practitioners.

The Board completed its investigation of the occupation of Respiratory Technology on December 1, 1982. On January 26, 1983, Mr. Elvin Christenson informed the Honourable David King, Minister of Education who is also responsible for Professions and Occupations, of the Board's recommendation, that the degree of risk of harm to the public that may result from the practice of this occupation is such that the occupation should be a designated health occupation.

B. Electrology

The Board's investigation of this occupation was initiated by a request from the Electrolysis Society of Alberta in January of 1982.

The Board requested written briefs of 17 organizations. The following 11 concerned groups elected to prepare written briefs; the first six also made oral presentations at the Board's meeting on January 18-19, 1983:

1. Alberta Dermatology Association
2. Cosmetology Schools of Canada Limited
3. Electrolysis Society of Alberta
4. Foothills Association of Electrologists (Alberta)
5. Kree International (a manufacturer of electrology equipment)
6. Western Society of Certified Electrologists (Alberta)
7. Alberta Hospitals and Medical Care
8. Alberta Medical Association
9. Association of Professional Electrologists of British Columbia
10. College of Physicians and Surgeons of Alberta
11. Electrolysis Association of Ontario

Nine of these concerned groups opposed the designation of this occupation. Among the reasons given for this opposition were the following:

1. The risk of harm to the public from the practice of this occupation is very low.

2. The present system of regulating practitioners is adequate.

3. Electrolysis is not a health occupation, but is rather, a cosmetic related occupation.

4. There is no consensus in the profession as to the need for regulation under the Act.

The Board completed its investigation of the occupation of electrolysis on January 19, 1983. On January 26, 1983 Mr. Elvin Christenson informed the Honourable David King, Minister of Education who is also responsible for Professions and Occupations, of the Board's recommendation that this occupation not be designated under the **Health Occupations Act**, as the risk of harm to the public from the practice of this occupation was not sufficient to warrant such designation. The Board also noted that there was considerable opposition to the designation of this occupation from concerned groups, including organizations for electrolysis personnel.

C. Herbalist

In a February 26, 1982 letter to the Health Occupations Board, the Alberta College of Remedial Herbalists Association requested that the Board conduct an investigation to determine if the occupation of herbalist should be a designated health occupation.

Of the 13 groups the Board contacted the following 8 chose to submit written briefs; the first 3 also chose to make an oral presentation at the Board's February 16, 1983 meeting:

1. Alberta College of Remedial Herbalists Association
2. Dominion Herbal College Ltd.
3. Wild Rose College of Natural Healing
4. Alberta Association of Naturopathic Practitioners
5. Alberta Hospitals and Medical Care
6. Alberta Medical Association
7. Alberta Pharmaceutical Association
8. College of Physicians and Surgeons of Alberta

Four groups opposed the designation of this occupation on various grounds, principally that the degree of risk of harm from the practice of this occupation did not warrant such designation.

On February 16, 1983, the Board completed its investigation of this occupation. The Board concluded that the current practice of herbalism did not constitute a significant degree of risk of harm to the public and, therefore, the Board recommended that this occupation not be designated under the **Health Occupations Act**. The Board was also cognizant of the fact that the practice of herbalism is regulated under several other acts: **Food and Drug Act, Medical Profession Act, Pharmaceutical Association Act**, which control the types of substances herbalists may employ and the circumstances of their use.

On March 14, 1983 Mr. Christenson conveyed the Board's recommendation to the Honourable Mr. David King, Minister of Education who is also responsible for Professions and Occupations.

D. Nursing Assistant

On October 28, 1982 the Alberta Association of Registered Nursing Assistants requested that the Board conduct an investigation to determine if the occupation of nursing assistant should be a designated health occupation.

The Board requested written briefs from 32 organizations or concerned groups. The following 13 submitted briefs, and the first three also made oral presentations to the Board.

1. Nursing Assistant Registration Board
2. Alberta Association of Registered Nursing Orderlies
3. Alberta Association of Registered Nursing Assistants

4. Alberta Vocational Centre, Calgary
5. Alberta Vocational Centre, Edmonton
6. Alberta Hospital Association
7. Alberta Medical Association
8. Alberta Association of Registered Nurses
9. Association of New Brunswick Registered Nursing Assistants
10. Saskatchewan Nursing Assistants' Association
11. Alberta Hospitals and Medical Care
12. Alberta Social Services and Community Health
13. Manitoba Department of Health

Of the above 13 groups, 4 opposed designation under the Health Occupations Act primarily on the grounds that nursing assistants should continue to be registered under the **Nursing Assistants Registration Act**.

The Board completed its investigation of this occupation on March 17, 1983. On May 30, Mr. Christenson informed the Honourable David King, Minister of Education who is also responsible for Professions and Occupations, of the Board's recommendations that:

1. the **Nursing Assistants Registration Act** be repealed,

2. legislation be enacted to designate the occupation of nursing assistant under the **Health Occupations Act**, and

3. if the occupation is designated, nursing orderlies should be represented on the committee appointed for this occupation.

E. Rehabilitation Practitioner

On June 21, 1982, the Alberta Association of Habilitative Practitioners requested that the Alberta Health Occupations Board conduct an investigation to determine if the occupation of rehabilitation practitioner should be a designated health occupation.

The Board solicited written briefs from 20 concerned groups. Of these 20 groups, 12 prepared briefs and are listed as follows:

1. Grant MacEwan Community College
2. Lethbridge Community College
3. Mount Royal Community College
4. Red Deer Community College
5. Alberta Association of Registered Occupational Therapists
6. Psychiatric Nurses Association of Alberta
7. Alberta Social Services and Community Health (Michener Centre)
8. Alberta Social Services and Community Health (Health Services Division)
9. Alberta Hospitals and Medical Care
10. Alberta Medical Association
11. Psychologists Association of Alberta
12. Alberta Association of Habilitative Practitioners

Of these concerned groups the first seven listed also made oral presentation before the Board. The community colleges, however, made a joint presentation.

Only one group opposed the designation of this occupation. This opposition was based on the belief that designation would impair the employee-employer relationship.

After considering all information presented to it, the Board concluded that the occupation of rehabilitation practitioner should be designated Health Occupation. On July 19, 1983 Mr. Elvin Christenson conveyed the Board's recommendations to the Honourable David King, Minister of Education who is also responsible for Professions and Occupations.

F. Orthopaedic Technology

A November 16, 1982 letter from the Alberta chapter of the Canadian Society of Orthopaedic Technologists initiated the investigation to determine if the occupation of orthopaedic technology should be a designated health occupation.

The Board contacted 13 groups about preparing written briefs on the occupation of othopaedic technology. The following four groups submitted briefs and the first two also made oral presentations before the Board:

1. Canadian Society of Orthopaedic Technologists
2. Alberta Association of Registered Nursing Assistants
3. Alberta Hospitals and Medical Care
4. Alberta Hospital Association

Two of the concerned groups opposed the designation of this occupation, on the grounds that this occupational group was a specialized group of nursing assistants and were effectively regulated as such.

At its meeting on June 22, 1983 the Board considered all the written and oral information it had received on this occupation. The Board concluded that the services of an orthopaedic technologist could be and, in general, were provided by nursing assistants. Therefore, the Board decided to recommend that this occupation not be a designated health occupation. Although the practice of orthopaedic technology did involve a clear risk of harm, the best interests of the public would be served by continuing to regulate these practitioners as nursing assistants.

On August 30, 1983, Mr. Christenson conveyed the Board's recommendation to the Honourable Mr. David King, Minister of Education who is also responsible for Professions and Occupations.

G. Acupuncture

The Board's investigation of the occupation of acupuncture was initiated at the request of the Acupuncture Society of Alberta on March 25, 1982.

The Board solicited written briefs from fifteen groups that might be concerned about the occupation of acupuncture. Of these, seven prepared written briefs for the Board's consideration, and four also made oral presentations at the Board's August 2-3, 1983 meeting. These seven concerned groups are listed with the groups making oral presentations first:

1. Acupuncture Society of Alberta
2. Canadian Acupuncture Association of Canada Inc.
3. Acupuncture Association of B.C.
4. College of Physicians and Surgeons of Alberta
5. Alberta Association of Naturopathic Practitioners
6. Alberta Medical Association
7. Alberta Hospitals and Medical Care

In addition to these briefs, the Board also received over 150 letters from concerned citizens about the designation of this occupation. At its August meeting the Board interviewed five of these individuals who had used the services of acupuncturists. The Board also visited two acupuncture clinics in Calgary.

All parties were agreed that the practice of acupuncture involved a clear risk of harm to the public. Those that opposed the designation of this occupation argued that acupuncture was a medical act and the risk involved was such that the occupation should be regulated under the **Medical Profession Act**.

On August 2-3, 1983 the Board considered the information presented in the written briefs, letters from citizens, oral presentations, and interviews. In addition the Board was very impressed by the public demand for this service and by the very high level of consumer satisfaction. The Board, therefore, concluded that the public interest would best be served by regulating this profession under the **Health Occupations Act**.

In view of the risk associated with this occupation the Board also explicitly recommended that the Health Occupations Committee for this occupation should have a member from the College of Physicians and Surgeons and, that this person should be knowledgeable in the practice of acupuncture.

The Board's recommendations were conveyed to the Honourable Mr. David King, Minister of Education who is also responsible for Professions and Occupations, by Mr. Christenson on October 16, 1983.

H. Domiciliary Midwifery

In a June 14, 1982 letter the Alberta Council and Register of Domiciliary Midwives Association requested that the Health Occupations Board conduct an investigation to determine if the occupation of Domiciliary Midwifery should be a designated health occupation.

The Board initially interpreted the request as seeking an investigation of the occupation of midwifery, but it subsequently confined its investigation to domiciliary midwifery at the request of the Alberta Council and Register of Domiciliary Midwives Association.

In conducting its investigation the Board contacted 19 concerned groups. Sixteen of these groups elected to prepare written briefs on the occupation of Domiciliary Midwifery for the Board. Of these eight, also, made oral presentations to the Board at its meeting of September 12-14, 1983. The groups which provided written briefs for the Board are listed as follows with those also giving oral presentations listed first:

1. Alberta Council and Register of Domiciliary Midwives
2. Alberta Association of Registered Nurses
3. Western Nurse Midwives Association
4. Calgary Association of Parents and Professionals for Safe Alternatives in Childbirth
5. College of Physicians and Surgeons
6. Alberta Medical Association
7. College of Family Physicians of Canada
8. Faculty of Nursing, University of Alberta
9. British Columbia Midwives Association
10. International Association of Parents and Professionals for Safe Alternatives in Childbirth
11. Society of Alberta Medical Officers of Health
12. Alberta Advanced Education
13. Alberta Hospitals and Medical Care
14. Alberta Social Services
15. Association of Childbirth at Home International
16. Alberta Hospital Association

The Board also received 25 letters from individuals who were concerned about this occupation. At its September meeting the Board interviewed eleven of these individuals who had used the services of a midwife.

The arguments presented in opposition to the designation of this occupation emphasized three issues:

1. Safety - it is too risky to have births at home, the hospital and its technology are necessary in the event of an emergency.

2. Professional Unity - domiciliary midwifery is a suboccupation of midwifery; they should not be regulated separately.

3. Backup - at present there is no provision for medical backup at homebirths.

The decision of the Board respecting domiciliary midwives has not been conveyed to the Minister as of December 31, 1983. The Board's decisions are not released publicly until the Minister has received and considered them.

I. Hearing Aid Audiologists

The investigation to determine if the occupation of hearing aid audiology should be a designated health occupation under the **Health Occupations Act** was initiated by a request from the Alberta Hearing Aid Audiologist Association, June 25, 1982.

The Board contacted sixteen groups and asked for written briefs. The ten groups that submitted written briefs are listed below with the four groups that also made oral presentations listed first:

1. Speech and Hearing Association of Alberta
2. Alberta Hearing Aid Audiologist Association
3. Alberta College
4. National Hearing Aid Society
5. Alberta Otolaryngolical Society (AMA)
6. Alberta Advanced Education
7. Alberta Hospitals and Medical Care
8. Alberta Aids to Daily Living (S.S. & C.H.)
9. Alberta Hospital Association
10. Alberta Council on Aging

Of the ten groups that prepared briefs, five supported designation, three opposed, and two had no opinion. The opposition was, in this case, directed towards the issue of occupational title. These groups did not oppose the regulation of these personnel under the **Health Occupations Act**, but they were concerned that the occupational title of hearing aid audiologist implied a level of competence and expertise beyond that indicated by the level of training and responsibility of these practitioners.

At its meetings on November 8, 1983 and December 8, 1983 the Board heard oral presentations on the occupation of hearing aid audiology. At its December 8, 1983 meeting the Board concluded its investigation of the occupation. The Board's recommendation will be conveyed to the Minister sometime in the new year.

VI. REQUESTS FOR NEW INVESTIGATIONS

During 1983 the Board received requests to conduct investigations to determine if the following occupations should be designated under the **Health Occupations Act**:

1. Remedial Gymnast and Recreational Therapist
2. Emergency Medical Technician - Ambulance
3. Laser Therapist
4. Therapeutic Masseur
5. Electroencephalograph Technician
6. Non-M.D. Medical Geneticists

VII. HEALTH OCCUPATIONS ACT AMENDMENTS

During the 1982-83 year the Legislative Assembly of Alberta amended the **Health Occupations Act** to designate six health occupations. Three were designated on June 6, 1983:

1. Emergency Medical Technician - Paramedic
2. Medical Radiation Technologist
3. Respiratory Technologist

Three more were designated on November 30, 1983:

1. Nursing Assistant
2. Rehabilitation Practitioner
3. Acupuncturist

VIII. FOR ADDITIONAL INFORMATION

For additional information about the **Health Occupations Act** and the Health Occupations Board please write or telephone:

Mr. Dennis Gartner
Registrar
Alberta Health Occupations Board
8th Floor, West Tower
Devonian Building
11160 Jasper Avenue
Edmonton, Alberta
T5J 3E4

Telephone: (403) 427-2655

Copies of the following are also available:

- Annual Report of the Health Occupations Board (1982)
- **Health Occupations Act**
- Information Pamphlet on the **Health Occupations Act** and the Health Occupations Board
- Procedures for Conducting Investigations of Health Occupations